

Matter 1: Overall Strategy

1. ***Do the CS vision and objectives set out a robust basis for tackling the key issues that have been identified?***

- ***Do they reflect an objective assessment of alternatives?***
- ***Is the CS Vision reference to “reducing” unmet housing need consistent with national guidance in the NPPF (para 47)***

Do they reflect an objective assessment of alternatives?

- 1.1 Whilst the core strategy's vision and objectives set out a robust basis for tackling key issues in principle, they do not reflect an objective assessment of all alternatives and conflict with subsequent policies in the document.
- 1.2 The Council's reliance on individual strategic allocations sites, such as Policy CM1 Lockyer's School site to deliver growth and housing in Corfe Mullen, reflects an inadequate objective assessment of alternative sites in the area and a policy that is contrary to the core strategy's vision and objectives.
- 1.3 These issues are discussed in greater detail at matter 5 and particularly focus on the master planning exercise that was undertaken to identify the greenfield development sites that are required to meet the housing needs of the plan area. Policy CM1 includes proposals that will result in the loss of existing community facilities (contrary to the core strategy vision), result in the potential loss of green belt land (contrary to objective 1 of the core strategy) and promote development that is uncertain of being deliverable.

Is the CS Vision reference to “reducing” unmet housing need consistent with national guidance in the NPPF (para 47)

- 1.4 The core strategy's vision to reduce unmet housing need and its objective to deliver sufficient housing in Christchurch and East Dorset to reduce local needs is insufficient and not in accordance with national guidance. The approach does not reflect the emphasis of the NPPF and the presumption in favour of sustainable development contained within it, to deliver growth and fully meet objectively assessed needs.
- 1.5 The NPPF sets out a number of tests in respect of identifying and meeting objectively assessed housing needs. These tests are set within the presumption in favour of sustainable development, paragraph 14 for 'plan-making', and further explained at paragraphs 47 and 159 of the NPPF. These paragraphs confirm that Local Planning Authorities (LPAs) must boost the supply of housing land, using the evidence base to meet the full objectively assessed need (47), and that the objective assessment must meet household and population projections (159). Further that in identifying need they must cater for housing demand, and the scale of supply, necessary to meet this demand.
- 1.6 The NPPF is also clear in regard to the importance the government is placing on meeting housing needs, stimulating growth and preparing plans 'positively'. It is implicit in the NPPF that the government places significant weight on the benefits housing building can deliver to the economy.
- 1.7 We do not consider the core strategy is consistent with the NPPF as it simply

seeks a reduction in unmet housing need, and this approach fails to positively seek opportunities to fully meet objectively assessed housing needs.

- 1.8 The current approach to housing delivery is not sound and it does not allow for sufficient land to be identified to meet objectively assessed housing needs. Additional flexibility needs to be introduced to allow sustainable sites in sustainable locations that are capable of accommodating additional growth to come forward.

4. *Is the proposed quantum of housing development (KS3) justified by the evidence? Does it:*

- ***take account of unmet housing need in adjacent districts?***
- ***take account of up to date population data?***
- ***allow for inward migration?***
- ***take account of economic/employment growth?***

- 4.1 Policy KS3 is central to the Core Strategy as it provides a single policy for housing provision and a single housing figure for Christchurch and East Dorset, for the plan period. Therefore it is vital for the future of the combined districts that the figures are set at a level, which will ensure that the housing needs of the plan area can adequately be met and provide confidence in the future.

- 4.2 Paragraph 159 of the NPPF requires that LPAs have a clear understanding of housing needs within their area. In this context, the key evidence base supporting the housing figures for each district in the pre-submission Core Strategy (April 2012) was the publically accessible Strategic Housing Market Assessment (SHMA, 2012). Since the publication of the pre-submission Core Strategy, the Council's supporting evidence to demonstrate objectively assessed need now includes figures that have been produced by Dorset County Council calculated using new data from the 2011 census.

- 4.3 The Dorset County Council figures estimate that household growth for the plan area is about 500 dwellings per year over the plan period. This is notably lower than the SHMA (2012) that estimated the household growth figure to be 575 dwellings per year and substantially lower than previous SHMAs, which have estimated household growth of up to around 800 dwellings per year. All of these figures demonstrate that changing data over time has resulted in variations to these figures and an appropriate means of accurately reflecting housing need should therefore be to utilise all of this relevant data in order to determine a housing target that lies within the most complete range of estimates. This will ensure the housing target is robust and that it reflects the demonstrated need over time as opposed to simply the most recent figures.

- 4.4 The consolidated version of the Core Strategy (February 2013) and Council's analysis of Core Strategy responses (May 2013) state that the proposed housing target for the plan period lies within the range of the estimates provided by the SHMA (2012) and the Dorset County Council data,

The SHMA and Dorset County Council data have informed a single housing target for the plan area. In order to provide additional flexibility and to give a tolerance for potential non-delivery of some proposals, the joint housing target

has been set at 8,200 dwellings. (para 4.18, consolidated version of the Core Strategy, February 2013)

- 4.5 This is a reduction from the previous figure in the pre-submission Core Strategy (April 2012), which provided for 8,270 (based on 3,020 for Christchurch and 5,250 for East Dorset) homes over the plan period. As highlighted by our previous representations, the housing figure in the pre submission Core Strategy was set below the figure in the SHMA (2012) to the extent that there would be a shortfall of 355 dwellings within the district over the plan period.
- 4.6 The revised housing target for the consolidated cores strategy takes no account of previous SHMAs that have estimated household growth to be considerably higher than those in the SHMA (2012) and Dorset County Council data.
- 4.7 The housing provision figure should reflect all available data, including previous SHMAs, to better account for economic fluctuations and other factors such as inward migration. The joint housing target should include the full range of figures available to ensure additional flexibility and that the plan is able to respond to potential changes in patterns of housing need.
- 4.8 Even if the figures are proved to be accurate there are no provisions should any of the proposed allocations sites be undeliverable and there is insufficient flexibility to take account of any miscalculation or housing provision beyond the plan period.
- 4.9 In this respect Policy KS3 cannot be considered to be positively planned or justified, as it does not reflect the entirety of data available to the Councils or allow for sufficient flexibility. The housing target reflects a conservative approach to house building in the plan area that could restrict future growth over the plan period and in the longer term.
- 5. *Should the housing provision:***
- ***allow 10% for vacancy rates and second homes?***
 - ***provide a separate target for each Council area?***
- 5.1 The Councils have agreed to use a single housing target to reflect the joint strategy proposed for the plan area, with the aim of ensuring greater certainty of delivery. However, this approach fails to appreciate local housing need at an individual settlement level and could result in the provision of housing being unfairly distributed.
- 5.2 Each of the plan area settlements should have a separate target as the needs of each are different and serve different markets. For example, housing requirements for Corfe Mullen should be determined with reference to an assessment of housing need within the village, or an apportionment of a district-wide figure for housing need. This 'bottom-up' approach ensures that levels of housing provision are appropriately matched to the needs of the community. In Corfe Mullen, there is a particular and significant need for affordable housing with no new affordable housing having been delivered in over 16 years despite a population of c. 10,500 people.

8. ***Is the need for housing to be located outside the urban areas/ in the green belt justified by the SHLAA and other evidence?***
- 8.1 In order to meet the test of being justified the NPPF states that the plan should be: ***“the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence”***.
- 8.2 The identification and allocation of sites within the key settlements of the plan area has been based primarily upon a master planning exercise, which sought to determine the capacity of a number of areas of search to accommodate development. The individual sites that have become proposed allocations under this policy were presented for consultation at a time when the strategic housing requirement for the district had not been defined.
- 8.3 We consider that the master plan approach, while worthwhile in selecting suitable sites and setting development parameters, does not allow for sufficient flexibility or adequately account for the future housing requirements of the local plan area.
- 8.4 We would expect the housing requirements for Corfe Mullen to be determined with reference to an assessment of housing need within the village, or an apportionment of a district-wide figure for housing need.
- 8.5 In addition to the approach to the apportionment of development, the consultation process for the identification of sites within Corfe Mullen is inconsistent with the principle that the plan should be flexible. As outlined in previous representations, the earlier Options For Growth consultation did not present sufficient options for the delivery of housing in Corfe Mullen. Had a wider range of sites been identified at that earlier stage, there is the possibility that others could have emerged as being more appropriate to deliver growth in the village.